

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIMOTHY ZEGAR,

Defendant.

Case No. 23-mj-02009-01DPR

MOTION FOR DETENTION

Comes now the United States of America, by and through Teresa Moore, United States Attorney for the Western District of Missouri, and the undersigned Assistant United States Attorney, and hereby moves this Court to order the detention of the defendant, TIMOTHY ZEGAR, and states the following in support of the motion:

1. A complaint has been filed charging the defendant with being a felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g)(1).
2. Title 18, United States Code, Section 3142(f) provides, in pertinent part, that hearing must be held by the appropriate judicial officer to determine whether any condition or combination of conditions “will reasonably assure the appearance of such person as required and the safety of any other person and the community” if the attorney for the Government moves for such a hearing and the case involves:

“(E) any felony that is not otherwise a crime of violence that involves... the possession or use of a firearm... .”
3. The defendant was convicted of fleeing and eluding an officer, operating a firearm while intoxicated, and operating a motor vehicle while intoxicated in the Circuit Court for Racine County, Wisconsin, on June 7, 2016. The defendant was sentenced to a 42-

month term of imprisonment. These convictions arose from a high-speed chase involving multiple law enforcement agencies, with speeds reaching 100 miles per hour. The defendant was found to be intoxicated and armed with a .38 caliber handgun at the time of the offense. The details of the offense were the subject of news coverage at the time. See <https://www.fox6now.com/news/armed-man-leads-police-deputies-on-pursuit-that-reaches-100-m-p-h>.

4. The defendant has also been convicted of theft and has multiple convictions for driving while intoxicated. The defendant's criminal history notes that the defendant has been previously charged with bond jumping.
5. The defendant has ties to the "boogaloo movement," an anti-government, extremist group, with adherents who are currently awaiting trial for a litany of violent acts, including murder. In 2020, the defendant posted messages to a private Facebook Group, "Missouri Boogaloo Network," stating that the "[e]nd game is capturing the senate and house and publicly executing them." The defendant volunteered that he would be "a martyr for the cause."
6. The defendant most recently came to the attention of law enforcement officials after investigators received information indicating that he was actively trafficking firearms.
7. On January 21, 2023, a special agent of the Bureau of Alcohol, Tobacco, and Firearms, operating in an undercover capacity, purchased a Spike's Tactical, model ST15, .556 caliber rifle, from the defendant at his residence.
8. On February 1, 2023, a federal search warrant was executed upon the defendant's residence. Investigators recovered 11 firearms, a silencer, over 1000 rounds of ammunition, approximately five to ten pounds of a binary explosive, and seven ballistic body armor plates. The defendant was questioned and admitted to possessing firearms.

9. The evidence against the defendant is overwhelming.

Wherefore, based upon the foregoing, the United States submits that there is clear and convincing evidence that there are no conditions which the Court could place upon the defendant that would reasonably assure the defendant's appearance in Court and the safety of the community. The Government therefore requests that a detention hearing be held and that the defendant be detained pending trial of this matter.

Respectfully submitted,

Teresa Moore
United States Attorney

By: /s/ James J. Kelleher
James J. Kelleher
Assistant United States Attorney
Missouri Bar No. 51921

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on February 3, 2023, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ James J. Kelleher

James J. Kelleher

Assistant United States Attorney